

Exhibit C

Tram Nguyen

From: Michelle Parfitt
Sent: Tuesday, September 08, 2020 1:02 PM
To: Tram Nguyen
Cc: Michelle Parfitt
Subject: Fwd: Plaintiffs Profile Forms submitted through MDL Centrality

Michelle A. Parfitt
Senior Partner

Ashcraft & Gerel, LLP
1825 K Street NW, Suite 700
Washington, DC 20006
Office: 202.783.6400
Mobile: 202.669.0032
Fax: 202.416.6392
mparfitt@ashcraftlaw.com



Begin forwarded message:

From: Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>
Subject: RE: Plaintiffs Profile Forms submitted through MDL Centrality
Date: September 3, 2020 at 2:29:41 PM EDT
To: "Sharko, Susan M" <susan.sharko@faegredrinker.com>, Michelle Parfitt <MParfitt@ashcraftlaw.com>
Cc: Sindhu Daniel <sdaniel@baronbudd.com>, "pec@talc-mdl.com" <pec@talc-mdl.com>

Are you refusing to have a call? You are misrepresenting the orders. We will advise all claimants to make that clear in oppositions to any motions to dismiss.

P. Leigh O'Dell
Principal
334.269.2343

From: Sharko, Susan M <susan.sharko@faegredrinker.com>
Sent: Thursday, September 3, 2020 1:26 PM
To: Michelle Parfitt <MParfitt@ashcraftlaw.com>

Cc: Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>; Sindhu Daniel <sdaniel@baronbudd.com>

Subject: RE: Plaintiffs Profile Forms submitted through MDL Centrality

Thanks. We will hold off until Monday filing a motion to dismiss with prejudice for failure to comply with the order but expect you all to use the extra time to make this unnecessary. Appreciate your anticipated help. Susan

From: Michelle Parfitt <MParfitt@ashcraftlaw.com>

Sent: Thursday, September 3, 2020 10:22 AM

To: Sharko, Susan M <susan.sharko@faegredrinker.com>

Cc: Leigh O'Dell <Leigh.ODell@beasleyallen.com>; Sindhu Daniel <sdaniel@baronbudd.com>

Subject: Re: Plaintiffs Profile Forms submitted through MDL Centrality

This Message originated outside your organization.

Susan, Good morning. Yes it has been busy for quite some time and yes we were doing our very best as leadership to get these PPFs to you as efficiently as we could. We are confident that we ushered these forms to JJ with the best of intentions and efforts. You received 925 PPF on September 2. All we are asking is to give us until Friday to reconcile the status of the 49 cases that were not submitted. A fair and considered ask and it will not prejudice JJ.

I suspect in the time it takes us to bring this "ask" to the Court we will have a fulsome explanation to provide to JJ regarding the 49 claims not submitted. We plan to speak to the firms that represent the 49 claimants today and are optimistic that we will have a clearer explanation. We learned the final count at midnight when I shared the count with you.

In the past our discussions seem to resolve these issues. We are more than happy to get on the phone if you believe that would allow us to address this issue to everyone's satisfaction.

Regards,
Michelle

Michelle A. Parfitt

Senior Partner

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Washington, DC 20006
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Mobile: 202.669.0032
Fax: 202.416.6392
mparfitt@ashcraftlaw.com



On Sep 3, 2020, at 9:26 AM, Sharko, Susan M <susan.sharko@faegredrinker.com> wrote:

You all obviously had a late night. Not sure what you are asking here. It was quite disappointing to see that the majority of the fact sheets didn't come in until the last day, compressing our review time. You will see that our notices, going out today, provide a short grace period to enable plaintiffs to correct their

deficiencies. Given the schedule in place, we do not agree to do nothing until Friday as that would prejudice our review. Thanks. Susan.

From: Michelle Parfitt <MParfitt@ashcraftlaw.com>
Sent: Thursday, September 3, 2020 12:09 AM
To: Sharko, Susan M <susan.sharko@faegredrinker.com>
Cc: Leigh.ODell@beasleyallen.com; Sindhu Daniel <sdaniel@baronbudd.com>; Michelle Parfitt <MParfitt@ashcraftlaw.com>
Subject: Plaintiffs Profile Forms submitted through MDL Centrality

This Message originated outside your organization.

Good evening Susan,

Our records reflect that as of this evening 925 Plaintiff Profile Forms (PPF) have been uploaded and submitted to JJ through MDL Centrality. It appears that there are 15 Dismissals and 49 cases that have not been submitted or served. There could be many reasons for this discrepancy, including issues with data entry, duplicate cases, or that cases have been voluntarily dismissed. We would like to take the opportunity tomorrow to reconcile the remaining cases with the representative firms and confirm which cases remain after any pending voluntary dismissals, duplication issues or data entry errors. We trust that you will agree to provide us with the opportunity to perform the reconciliation and address any issues by Friday, September 4th, as this will not prejudice JJ's review.

Kind regards,
Michelle, Leigh & Sindhu

Michelle A. Parfitt
Senior Partner

Ashcraft & Gerel, LLP
1825 K Street NW, Suite 700
Washington, DC 20006
Office: 202.783.6400
Mobile: 202.669.0032
Fax: 202.416.6392
mparfitt@ashcraftlaw.com

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